

**REMARKS**

Claims 1-23 remain pending in the application, with claims 24-39 having been previously canceled.

The Applicants respectfully request that the Examiner initial and return a copy of the IDSs filed on June 30, 2008, August 21, 2008 and September 23, 2008.

**Claims 1-7, 11-19, 22 and 23 over Ramasubramani, Barzegar and Iwama,**

In the Office Action, claims 1-7, 11-19, 22 and 23 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Patent No. 6,507,589 to Ramasubramani et al. ("Ramasubramani") in view of U.S. Patent No. 5,894,478 to Barzegar et al. ("Barzegar"), and in further view of U.S. Patent No. 6,600,735 to Iwama et al. ("Iwama"). The Applicants respectfully traverse the rejections.

Claims 1-7, 11 and 12 recite, *inter alia*, at least one **protocol gateway** to establish and manage a TCP/IP network connection with at least one registered message router, and to add an entry for the at least one registered message router in a message router table. Claims 13-19, 22 and 23 recite, *inter alia*, establishing and managing a TCP/IP network connection with at least one registered message router via at least one **protocol gateway**, and adding an entry for the at least one registered message router in a message router table with the at least one protocol gateway.

The Examiner alleged that Ramasubramani discloses a protocol gateway that manages network connections at column 9, lines 26-30. (see Office Action, page 2) The Applicants respectfully disagree.

Ramasubramani at col. 9, lines 26-30 discloses:

FIG. 6 is a block diagram of a communication system 600 according to an embodiment of the invention. The communication system 600 includes a network gateway 602 that facilitates access and retrieval of information from the Internet 216 to the wireless communication devices 202, 204 and 206 as did the multi-network gateway 214 illustrated in FIG. 2.

Ramasubramani's network gateway "facilitates access and retrieval of information from the Internet 216 to the wireless communication devices". Ramasubramani fails to disclose, teach or suggest a **protocol gateway that manages a TCP/IP network connection**, much less with a **message router**, as claimed.

Moreover, Ramasubramani's "message router" updates a "route table". (see col. 2, lines 49-53) Ramasubramani fails to disclose, teach or suggest a **protocol gateway adding an entry** for at least one registered message router in a message router table, as claimed.

The Examiner acknowledges that Ramasubramani fails to disclose a registered message router. (see Office Action, page 3) The Examiner alleges that "Barzegar teaches a system with a protocol gateways that establish connections through a message router (Column 3, lines 56-58)". (see Office Action, page 3)

Barzegar at col. 3, lines 56-58 discloses:

All messages received by the router are authenticated by monitoring a user identification (ID) and a source network address in the data message.

Barzegar at col. 3, lines 56-68 discloses a router. However, Applicants' claims are directed toward a message router that is **registered in a message router table**. Barzegar fails to disclose that his router is **registered in a message router table**, much less at least one **protocol gateway managing a TCP/IP network connection established with the at least one registered message router**, as recited by claims 1-7, 11-19, 22 and 23.

Barzegar mentions registration at col. 5, line 13. However, Barzegar discloses registration of a **wireless device** – not a **router**, much less at least one **protocol gateway managing a TCP/IP network connection established with the at least one registered message router**, as claimed.

The Examiner alleged that it would have been obvious to "use Barzegar's teaching of message authentication to increase the security of the system and prevent unauthorized requests." (see Office Action, page 3) Barzegar discloses such benefits from message authentication by **monitoring a**

user ID and a source network address in the data message. The benefit that the Examiner alleged is **NOT** a result of registering a message router in a table, much less at least one protocol gateway managing a network connection with the at least one registered message router, as claimed.

The Examiner alleged that "Iwama teaches a system for routing messages between gateways including the user of message routers (Fig 1, elements 102 and 107) that includes a table for tracking a registered gateways and routers (Col. 10, lines 59-62) where the gateway adds entries to the table (Col. 11, lines 54-65)." (see Office Action, page 3)

Iwama at col. 10, lines 59-62 and col. 11, lines 54-65 teaches:

The device status management table (1601) manages the relationship between the status of the gateway device (102) and the voice relay router (107) in the Internet (110) and the gate keeper (101) managing it.

In the bandwidth reservation condition table (1610) are registered data on a bandwidth or a band which is secured as a result of the bandwidth reservation processing by the bandwidth control unit (1505). In this case, with respect to each device number (1603), a counterpart device number (1611) and a reservation bandwidth (1612) are assumed to be stored, for example. When a plurality of counterpart devices are provided for a device number (1603), data of plural lines may be provided to the device number (1603). The bandwidth is usually registered in bits/second. If the reservation bandwidth (1612) is equal to zero, it means that no reservation is made.

Iwama teaches a gate keeper (101) that manages a connection between a gateway device (102) and a voice relay router (107). A gate keeper managing a connection between two other devices (see Iwama, Fig. 1) is not a protocol gateway establishing and managing a TCP/IP network connection with at least one registered message router, much less a protocol gateway adding an entry for at least one registered message router in a message router table, as claimed.

Ramasubramani, Barzegar and Iwama, either alone or in combination, fail to disclose, teach or suggest at least one **protocol gateway** to establish and manage a TCP/IP network connection with at least one registered message router, and to add an entry for the at least one registered

message router in a message router table; and establishing and **managing a TCP/IP network connection with at least one registered message router** via at least one **protocol gateway**; and adding an entry for the at least one registered message router in a message router table with the at least one protocol gateway, as respectively recited by claims 1-7, 11-19, 22 and 23.

Accordingly, for at least all the above reasons, claims 1-7, 11-19, 22 and 23 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

### **Claims 8 and 20 over Ramasubramani, Callon and Boyle**

Claims 8 and 20 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani in view of U.S. Patent No. 5,251,205 to Callon et al. ("Callon") and U.S. Patent No. 6,119,167 to Boyle et al. ("Boyle"). The Applicants respectfully traverse the rejections. As discussed above, Ramasubramani fails to disclose, teach or suggest such features.

Claim 8 recites, *inter alia*, at least one **protocol gateway** to establish and **manage a TCP/IP network connection with at least one registered message router**, and to add an entry for the at least one registered message router in a message router table. Claim 20 recites, *inter alia*, establishing and **managing a TCP/IP network connection with at least one registered message router** via at least one **protocol gateway**, and adding an entry for the at least one registered message router in a message router table with the at least one protocol gateway. As discussed above, Ramasubramani fails to disclose, teach or suggest such features.

Callon and Boyle were relied on to allegedly disclose various features from dependent claims 8 and 20. (see Office Action, page 6) Dependent claims 8 and 20, are dependent from claims 1 and 13, respectively, and are patentable for all the reasons that claims 1 and 13 are patentable. Callon and Boyle fail to teach the features of the independent claims 1 and 13, i.e., at least one **protocol gateway** to establish and **manage a TCP/IP network connection with at least one registered message router**, and to add an entry for

the at least one registered message router in a message router table; and establishing and **managing a TCP/IP network connection with at least one registered message router** via at least one **protocol gateway**; and adding an entry for the at least one registered message router in a message router table with the at least one protocol gateway, as respectively recited by dependent claims 8 and 20 via their independent claims 1 and 13.

Thus, Ramasubramani, Callon and Boyle, either alone or in combination, fail to disclose, teach or suggest at least one **protocol gateway** to establish and **manage a TCP/IP network connection with at least one registered message router**, and to add an entry for the at least one registered message router in a message router table; and establishing and **managing a TCP/IP network connection with at least one registered message router** via at least one **protocol gateway**; and adding an entry for the at least one registered message router in a message router table with the at least one protocol gateway, as respectively recited by dependent claims 8 and 20.

Accordingly, for at least all the above reasons, claims 8 and 20 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

#### **Claim 9 over Ramasubramani, Callon and Kung**

Claim 9 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani in view of Callon, and further in view of U.S. Patent No. 6,826,173 to Kung et al. ("Kung"). The Applicants respectfully traverse the rejections.

Claim 9 recites, *inter alia*, at least one **protocol gateway** to establish and **manage a TCP/IP network connection with at least one registered message router**, and to add an entry for the at least one registered message router in a message router table. As discussed above, Ramasubramani and Callon, either alone or in combination, fail to disclose, teach or suggest such features.

Kung was relied on to allegedly disclose various features from dependent claim 9. (see Office Action, pages 6 and 7) Dependent claim 9 is dependent from claim 1, and is patentable for all the reasons that claim 1 is patentable. Kung fails to teach the features of the independent claim 1, i.e., at least one **protocol gateway** to establish and **manage a TCP/IP network connection with at least one registered message router**, and to add an entry for the at least one registered message router in a message router table, as recited by dependent claim 9 via its independent claim 1.

Thus, Ramasubramani, Callon and Kung, either alone or in combination, fail to disclose, teach or suggest at least one **protocol gateway** to establish and **manage a TCP/IP network connection with at least one registered message router**, and to add an entry for the at least one registered message router in a message router table, as recited by claim 9.

Accordingly, for at least all the above reasons, claim 9 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

#### **Claims 10 and 21 over Ramasubramani, Callon and Boyle**

Claims 10 and 21 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani, Callon, and further in view of U.S. Patent No. 6,138,158 to Boyle et al. ("Boyle2"). The Applicants respectfully traverse the rejections.

Claim 10 recites, *inter alia*, at least one **protocol gateway** to establish and **manage a TCP/IP network connection with at least one registered message router**, and to add an entry for the at least one registered message router in a message router table. Claim 21 recites, *inter alia*, establishing and **managing a TCP/IP network connection with at least one registered message router** via at least one **protocol gateway**, and adding an entry for the at least one registered message router in a message router table with the at least one protocol gateway. As discussed above, Ramasubramani and Callon, either alone or in combination, fail to disclose, teach or suggest such

features.

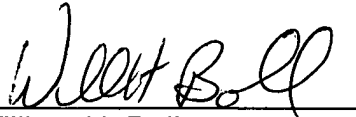
Boyle2 was relied on to allegedly disclose various features from dependent claims 10 and 21. (see Office Action, page 7) Dependent claims 10 and 21, are dependent from claims 1 and 13, respectively, and are patentable for all the reasons that claims 1 and 13 are patentable. Boyle2 fails to teach the features of the independent claims 1 and 13, i.e., at least one **protocol gateway** to establish and **manage a TCP/IP network connection with at least one registered message router**, and to add an entry for the at least one registered message router in a message router table; and establishing and **managing a TCP/IP network connection with at least one registered message router** via at least one **protocol gateway**; and adding an entry for the at least one registered message router in a message router table with the at least one protocol gateway, as respectively recited by dependent claims 10 and 21 via their independent claims 1 and 13.

Accordingly, for at least all the above reasons, claims 10 and 21 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William H. Bollman", written over a horizontal line.

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